

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Albert Russo Standing Chapter 13 Trustee PO Box 4853 Trenton, NJ 08650 (609) 587-6888 Standing Chapter 13 Trustee	
In re: Kristen L Mauro Debtor(s)	Case No. 25-10978 / MBK Hearing Date: April 23, 2025 10:00 am Judge: Michael B. Kaplan Chapter: 13

TRUSTEE'S OBJECTION TO DEBTOR(S) CHAPTER 13 PLAN

Albert Russo, Standing Chapter 13 Trustee, objects to the Debtor(s) Plan for the following reason(s):

The debtor has failed to supply the Trustee with the following document (s):

A copy of the last filed tax return - 2024 BY 5/15/2025

A copy of the homeowner's insurance renewal declaration - with proof of liability coverage

The Plan provides for payment on unsecured claims of less than that which would be distributed upon liquidation under Chapter 7, as prohibited by 11 U.S.C. § 1325(a)(4):

-There is \$144,525.43 non-exempt in the house

-There is \$2,200 non-exempt in electronics

-There is \$300 non-exempt in clothing

TOTAL NON-EXEMPT EQUITY \$147,025 (100% PLAN.)

-Need to file Pre-Confirmation Certification with Court

WHEREFORE, Standing Chapter 13 Trustee, Albert Russo, objects to confirmation of the plan.

/s/ Albert Russo

Albert Russo

Standing Chapter 13 Trustee

by: David Martin, Staff Attorney